

OFFICE OF AUDITS
MEMORANDUM REPORT ACDA-7-IM-001
RECORDS MANAGEMENT
IN
THE ARMS CONTROL AND DISARMAMENT AGENCY
NOVEMBER 1996

The Office of Inspector General (OIG) performed this review to determine whether the Arms Control and Disarmament Agency (ACDA) manages its official records in compliance with Federal records management requirements. We focused specifically on how ACDA manages and safeguards its official records and on its records management guidance and training.

ACDA's records management operations were not fully in compliance with Federal requirements, which state that agencies should provide records officials with updated guidance regarding their records management responsibilities and should also provide training to officials responsible for official records. Contrary to these requirements, ACDA's records management guidance was outdated and had not been distributed to individuals with records management responsibilities. According to ACDA's response to our draft report, updated guidance is being reviewed by the National Archives and Records Administration (NARA). In addition, ACDA has not provided records management training to employees who are responsible for maintaining official records.

Because records management guidance and training were not readily available, official records may have been destroyed and, in some instances, retained longer than necessary. ACDA employees we spoke with were unfamiliar with records management requirements. Records management guidance must be kept up-to-date, distributed, and enforced to prevent the loss, destruction, or over-retention of ACDA's official records.

The OIG recommends that the Bureau of Intelligence, Verification and Information Management (IVI) issue updated records management guidance and distribute the guidance to records management coordinators (RMC) and other employees responsible for maintaining and managing records, including delegation leaders and conference support staff. In addition, we recommend that IVI work with the Department of State's Bureau of

Administration, Office of Information Management, Records Management Branch to determine the extent to which volume 5 of the Foreign Affairs Manual, chapter 400 "Records

Management Guidance," and volume 5 of the Foreign Affairs Handbook could be used for ACDA's records management guidance. Finally, we recommend that IVI's Information Management and Computer Operations Division (IVI/IC) coordinate with the Department's Foreign Service Institute to provide records management training to RMCs and other employees with records responsibilities.

ACDA's comments on a draft of this report generally agreed with its intent and recommendations. This report includes our responses to ACDA's comments, which are included as appendix A. In its response to our draft report, ACDA's officials stated that records management guidance has been updated and will be distributed to records management coordinators, subject to NARA's approval. ACDA's response also stated that State Department's guidance and training are specific to State Department components. Consequently, ACDA is developing its own training courses. In response to ACDA's actions and comments, we have changed the text, as appropriate, but continue to include our recommendations with relevant wording changes.

Also in response to our draft report, the Foreign Service Institutes' (FSI) Acting Director stated that the Institute's course on "Files Management and Retirement" may meet ACDA's needs or could be tailored to meet ACDA's specific needs. FSI's comments are included as appendix B.

PURPOSE AND SCOPE

To evaluate how well the Arms Control and Disarmament Agency manages its official records, we examined Federal requirements for records management, including Federal laws and regulations as well as guidance from the Office of Management and Budget (OMB), NARA, and the General Services Administration (GSA). We reviewed ACDA's policies, procedures, and internal memoranda to determine whether records management operations were adequate to maintain ACDA's official records. We interviewed ACDA officials with records management responsibilities, reviewed prior audit reports that ACDA and other Federal agencies have published, and examined cables pertaining to ACDA's records management activities.

Because we were performing records management audits at the Department of State and ACDA in parallel, we performed field work intermittently between October 1994 and March 1996 at IVI/IC. We also visited the U.S. Mission to the Delegation to the Conference on Security and Cooperation in Europe in Vienna, Austria, and the U.S. Delegation to the Conference on Disarmament in Geneva, Switzerland, in November 1994. In June 1995, we discontinued our work in ACDA to complete the audit of the Department of State's records management practices. We resumed our audit of ACDA's records management practices in October 1995.

We conducted our review in accordance with generally accepted government auditing standards and included such tests and auditing procedures as were considered necessary under the circumstances. This review was performed by the Information Management Division of

the Office of Audits. Major contributors to this report were Andrea Leopold, division director; Gregory Linden, audit manager; Vickie McCray, auditor-in-charge; Kathryn Lantz, auditor; and Sheree Strawbridge, auditor.

BACKGROUND

Recently, both Congress and Federal agencies charged with records management oversight responsibilities have reemphasized the importance of properly managing and maintaining official records. ACDA works in collaboration with the Department of State on issues that affect national security and treaty negotiations. ACDA's representatives participate in negotiating bilateral and multilateral treaties and oversee and evaluate security and arms control agreements. ACDA is the official repository for all records pertaining to arms control, disarmament, and nonproliferation treaties and agreements to which the United States is a party and which were under negotiation or in force on or after January 1, 1990. The critical nature of these negotiations and conferences highlights the importance of ACDA's records management responsibilities since these records contribute to the formulation of U.S. foreign and defense policy.

Federal Records Management Requirements

Managing official records is the responsibility of every Federal agency. Records are a basic component of each agency's information resources and must be managed in accordance with Federal requirements so that they may be preserved and available in the future. Official records include all books, papers, maps, photographs, and other documentary materials that Federal agencies create or receive, including electronic records. Like other resources, records must be managed properly to comply with Federal laws and regulations. The Federal Records Act of 1950 (Public Law 90-620), Title 44 of the United States Code, chapter 31 (44 U.S.C. 31), titled "Public Printing and Documents," governs Federal records management and provides records management requirements that all Federal agencies must follow.

The 44, chapter 31 provides the framework for Federal records oversight and provides specific guidance. The 18 U.S.C. (2071) and volume 36 of the Code of Federal Regulations, chapter 12, subchapter B "Records Management," establish penalties for destroying and removing official records when not performed in accordance with requirements. Three agencies -- OMB, NARA, and GSA -- collectively share in the oversight responsibilities for records management. OMB has overall responsibility for

information resources management policy. NARA provides assistance to Federal agencies concerning records management issues, ensures that records management policies are documented, approves records disposition, evaluates Federal records centers' operations, and preserves historical documents. To ensure economical and effective records management, GSA helps agencies on the use of staff, space, equipment, and supplies.

These three oversight agencies provide Federal departments and agencies with the necessary guidance for effective records management and policy documentation and schedules for retiring documents. The 44 U.S.C. specifically outlines the laws and regulations for safeguarding official records and tasks each agency to establish a program to manage, retain, and properly retire records that have historical significance.

The disposition of records is an integral part of records management. All official records, regardless of media, fall into one of two categories for disposition purposes: (1) temporary records or (2) permanent records. Temporary records should be destroyed after a fixed period of time or after the occurrence of a specific event. Most Federal records are temporary. Permanent records are valuable for historical and other purposes and warrant continued preservation. Relatively few Federal records are permanent, although the exact percentages differ among agencies.

NARA has also defined other types of records, including non-official records and personal papers. Non-official records include extra copies of documents, library or museum materials used for reference or exhibition, catalogs, and trade journals. There is no requirement to keep these records. Personal papers are distinguished from official records and non-official records, belong to individuals, and are not used to conduct official or agency business. Personal papers include records of family matters, personal calendars, drafts of articles, and books. Personal papers kept in government offices should be clearly marked and kept separate from other records.

Arms Control and Disarmament Agency's Records Management Structure

IVI/IC manages all of ACDA's computer and telecommunication assets, including staff, computers, training, software development and computer procurement. In addition, this division develops and maintains electronic treaty databases and administers the Agency's records management program.

IVI/IC is responsible for ACDA's records management activities. The responsibility for managing ACDA's records is delegated to the records management officer (RMO) whose duties include (1) conducting domestic and overseas reviews to ensure compliance with ACDA's guidance and Federal requirements, (2) providing guidance and training on records management activities, and (3) acting as a liaison with NARA for retiring and retrieving records. Designated RMCs in ACDA's bureaus and offices perform daily records management duties. RMCs assist with subject file classification and provide instruction and guidance to other employees on records disposition including file retention, destruction, and retirement to records service centers.

FINDING

ACDA HAS NOT FULLY COMPLIED WITH

RECORDS MANAGEMENT REQUIREMENTS

ACDA has not managed its records management program in full compliance with Federal requirements and oversight agencies' guidance. While ACDA has recently focused significant resources on improving its records management operations, ACDA has not yet established a program that effectively safeguards and properly retires its official and historical records. For example, some of ACDA's records management guidance was nearly 10 years old when we reviewed these activities. That guidance was no longer applicable. Although ACDA's response indicates that updated guidance has been written, it has not been approved by NARA or distributed to Records Management Coordinators. In addition, records management training has not been provided to employees with records management responsibilities. As a result, ACDA employees and conference representatives are not familiar with records management requirements.

ACDA's employees create and maintain a variety of classified and unclassified official records vital to its mission and the formulation of U.S. foreign and defense policies. However, these records have not been properly managed or maintained. In 1993, OIG's Office of Investigations reviewed possible unauthorized destruction of records and closed the review in November, 1994 without an official finding of wrongdoing. However, during the investigation, ACDA's RMO stated that working files, which are permanent records, had been accidentally destroyed along with temporary records. In other instances, documents that should have been disposed of have been retained. For example, in its evaluation of ACDA's records management program, NARA reported¹ that many ACDA employees incorrectly save and retire their chronological files as permanent files. In addition, ACDA's RMO conducted a survey which found that some program offices incorrectly retained duplicate files as well as temporary files from the 1960s and 1970s.

Outdated Records Management Guidance

ACDA's records management handbook has not been updated since 1988. The handbook references Federal laws and guidance on preserving presidential recordings and materials, NARA bulletins, executive orders on designating officials to classify national security information. Also included in the handbook are ACDA's records retention and disposition schedules. However, the handbook describes ACDA as it existed in 1988 and does not clearly address records unique to specific new offices. Moreover, Federal requirements mandate frequent updates to agencies' records management guidance.

ACDA records management guidance does not reflect advances in technology that have changed how records are created and maintained. ACDA's handbook contains no instructions on how to manage contemporary records, such as electronic files. In 1995,

¹A NARA Evaluation, *Records Management in the U.S. Arms Control and Disarmament Agency*, Washington, D.C., December 1995.

NARA issued a governmentwide policy on using electronic mail (e-mail) that was not reflected in ACDA's records management guidance. Because ACDA's records management guidance did not contain procedures on how to manage and store official e-mail, employees told us that they were uncertain about how to maintain these records. IVI/IC has an extensive electronic records system, which NARA recently classified as official records that should be permanently archived. ACDA employees reported that the electronic files stored in this system allow them to retrieve and query information. However, the database is not mentioned in the handbook.

ACDA took steps to update its outdated records management guidance by awarding a contract for a variety of records management services. Contractors began work in April 1995 and planned to complete a revised Records Management Handbook by the end of 1996. IVI/IC officials estimated that the cost for updating the records management guidance would be between \$25,000 and \$50,000. These officials agreed to evaluate whether the agency could use parts of the State Department's updated volume 5 of the Foreign Affairs Manual, chapter 400 and volume 5 of the Foreign Affairs Handbook. ACDA's efforts to update its records handbook could have been reduced if some of the State Department's guidance was used. In response to our draft report, ACDA stated that contract staff reviewed the State Department's guidance and concluded that nearly all of the procedures were relevant only to components within the State Department. According to ACDA's response, contract staff used the same NARA publications and GSA guides used by the State Department and developed a new draft handbook. NARA is now reviewing the updated handbook and when it receives NARA's approval it will be distributed to ACDA staff with records management responsibilities

Training Not Provided

Many of the RMCs who have been delegated to oversee records management activities in bureaus and offices have not had adequate records management training. RMCs and other employees assigned to ACDA's domestic offices and three overseas offices stated that because they had not received records management training, they were confused about

their records management responsibilities. The RMCs stated that records management training has not been readily available for some time and ACDA officials agreed that records management training had been inadequate and intermittent.

The RMO's responsibilities for administering the records management program includes overseeing records management awareness programs and performing records management evaluations. ACDA's comments on the draft report indicate that ACDA's 1993 pilot project with NARA was initiated to survey ACDA's records holdings and develop an updated Records Control Schedule --not to provide training. A NARA archivist travelled with ACDA's RMO to help with management evaluations at bureaus and offices. However,

ACDA's overseas employees expected to receive records training during the RMO's visit since records management awareness is a major part of an RMO's duties. In fact, some employees stated that they had received limited training during the RMO's visit.

Training is essential to an effective Federal records management program. Training provides employees with the knowledge and skills required to manage, maintain, and preserve agency records. Records management officials said that records training is important and they hope to establish a program to address training needs. However, current records management training is informal.

Employees in ACDA's Geneva office stated that although records management training was requested, it was not always provided because it is not an agency priority. For example, the RMO's 1993 visit disclosed that the employees did not receive the training they needed and expected. The RMO's review focused on the contents in the employees' files and did not provide on-site records management training. The employees stated that there was little discussion about how to properly manage, maintain, and dispose of official records. In ACDA's Vienna office, a secretary and other ACDA employees credited the RMO's site visit as the impetus for Vienna's new and more effective records filing system. However, the RMO did not provide training to ACDA employees in Vienna.

Further, because ACDA's records guidance is outdated and training is not provided, employees we spoke with throughout ACDA said they were uncertain about Federal records requirements. Few employees knew how long specific types of records should be kept or whether they should be destroyed. Many believed all older records and inactive files should be thrown away when they are no longer needed for current work. For example, in 1993, a new employee found her office filled with her predecessor's files. The employee did some "house cleaning" and discarded nearly all of the files. According to the RMO, the majority of the discarded files were temporary records. However, a limited number of files contained information on arms control, nonproliferation, and disarmament agreements and warranted permanent preservation because they recorded official business.

ACDA's Records are Susceptible to Loss

ACDA's structure and role in disarmament and security conferences subjects its official records to higher than normal risk of loss. Disarmament and security conferences, as well as treaty negotiations in which ACDA is a participant, take place at overseas locations. Delegations are composed of ACDA employees and representatives from various U.S. Government organizations, educational institutions, and the private sector. Delegation members negotiate the United States' interests in bilateral and multilateral arms control and security agreements. These delegations produce volumes of records for which ACDA is responsible. Given the importance of these records, it is imperative to manage and maintain them, and to safeguard them against destruction.

The primary responsibility for managing conference records belongs to the leader of each delegation. These leaders and delegation members determine which records created and used during the conference are official records. Delegation leaders are drawn from among the many experts who participate on behalf of the United States and may not be ACDA employees. Delegation leaders are often unfamiliar with records management requirements. At the conclusion of a conference, official records must be identified and managed, and those records not in ACDA's offices must be transferred into ACDA's custody.

It is not clear whether records are always properly transferred and maintained. For example, records from some treaty negotiations may have been mishandled. A high ranking ACDA official stated that official records were transferred from one ACDA office to another and inadvertently destroyed after 1 year. Neither the high ranking ACDA official nor ACDA employees could verify whether these records had been lost or destroyed. In response to our report, ACDA requested specific information so that it could review the matter further. We have provided ACDA with the requested information. Without proper controls over the disposition of records, delegation leaders and others who are unaware of records management requirements for managing, transferring, and archiving, may destroy or lose vital records.

ACDA's rotational staffing of conferences and negotiations further complicates its records management activities. Overseas negotiating delegations are supported by ACDA's permanent staff in Washington, D.C., as well as by action officers who, while assigned permanently in Washington, D.C., spend 6 to 8 weeks on a rotational basis assisting negotiating teams at conferences. Outgoing action officers pass their duties and records management responsibilities to incoming action officers with each rotation. Action officers, however, stated that they were not familiar with Federal records management requirements or with ACDA's records management policies and procedures. Therefore, ACDA cannot be assured that its records management requirements are being met.

CONCLUSION

Although ACDA has recently committed resources to records management, updated guidance has not been issued and training for all of its employees with records management responsibilities has not been provided. Until ACDA implements an effective records management program and enforces Federally-mandated processes and procedures, official records will remain vulnerable to loss and improper destruction.

Recommendation 1. We recommend that the Bureau of Intelligence, Verification and Information Management issue updated records management guidance and distribute the guidance to records Management Coordinators and employees including delegation leaders and conference support staff responsible for maintaining and managing records. As part of this effort, the bureau should work with the Records

Management Branch in the Department of State's Bureau of Administration to determine the extent to which volume 5 of the Foreign Affairs Manual, chapter 400 "Records Management Guidance," and volume 5 of the Foreign Affairs Handbook can be used.

In response to our draft report, ACDA substantially agreed with this recommendation. ACDA officials stated that contract staff have already undertaken an effort to update the Records Management Handbook. As a part of this effort, the contractors reviewed the State Department's guidance and concluded that nearly all of the procedures it contained were relevant only to components within the State Department. The final Handbook will be distributed to all ACDA staff with records management responsibilities when it is approved by NARA.

To close this recommendation, ACDA should provide us a copy of its updated Records Management Guidance and a plan showing how it intends to distribute the guidance to staff responsible for records management.

Recommendation 2. We recommend that the Bureau of Intelligence, Verification and Information Management's Information Management and Computer Operations Division provide records management training to Records Management Coordinators and other employees responsible for managing and maintaining official records. The bureau should coordinate with the Department of State's Foreign Service Institute to provide such records management training for its employees and delegation leaders.

In response to the draft report, ACDA agreed that records management training should be provided to appropriate ACDA staff. ACDA also stated that the Foreign Service Institute's "Files Management and Records Retirement" course (PK-207) was specific to State Department records management regulations and practices. ACDA stated that its records management goals would be better served by in-house developed training courses. ACDA anticipates beginning these courses in early FY 1997.

Also, in response to our report, the Foreign Service Institute's acting Director stated that FSI offers a monthly course on "Files Management and Retirement" that may meet ACDA's needs. However, FSI stated that it has not received any inquiries from ACDA concerning this course. FSI also stated that they would answer ACDA's questions and tailor the course to meet ACDA's unique requirements. In addition, FSI's course is current and offered monthly. We believe that ACDA should coordinate with FSI about its unique course requirements.

We continue to believe that most records management requirements apply governmentwide and that ACDA-specific additions to the State Department's course could save course development costs and time.

Appendices: A - IVI Comments

B - M/FSI Comments